

EXHIBIT A

FORA FINANCIAL HOLDINGS, LLC

Plaintiff,

VS.

NEW YORK TRIBECA GROUP, LLC and
JOHN DOES 1-10,

Defendants.

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: Case No. _____

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**PLAINTIFF’S FIRST SET OF REQUESTS FOR THE PRODUCTION OF
DOCUMENTS TO DEFENDANT NEW YORK TRIBECA GROUP, LLC**

Plaintiff Fora Financial Holdings, LLC (“Plaintiff”) pursuant to Federal Rule of Civil Procedure 34, requests that defendant New York Tribeca Group, LLC (“Tribeca”) produce the following documents and materials, together with a written response to these requests, at the offices of Locke Lord LLP on or before the deadline set by order of the Court.

DEFINITIONS

1. The terms “you” and “your” refer to defendant New York Tribeca Group, LLC and to its agents, employees, or any other persons acting or purporting to act on its behalf.
2. The term Fora Financial refers to Fora Financial Business Loans, LLC, the Plaintiff in the above-captioned action, and any of its parents, subsidiaries, affiliates, agents, employees, or any other persons acting or purporting to act on its behalf.
3. The term “Protected Information” means any information related to Fora Financial’s customers, including, but not limited to, customer contact information, government-issued identification numbers, proposed financing terms, and company financial information like

revenue and bank statements. A non-exhaustive list of Fora Financial's customers is set forth in paragraph 38 of Fora Financial's Verified Complaint, served herewith.

4. The words "document" and "documents" shall have the definition set forth in Local Rule 26.3(c)(2).

5. The words "communication" or "communications" shall have the definition set forth in Local Rule 26.3(c)(1).

6. The word "concerning" shall have the definition set forth in Local Rule 26.3(c)(7).

7. The connectives "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the request any information that might otherwise be construed to be outside of its scope.

INSTRUCTIONS

1. If any document or electronic data identified in response to a Request was, but is no longer in your possession or subject to your custody or control, or was known to you, but is no longer in existence, state what disposition was made of it and the purpose or circumstances surrounding that disposition.

2. All Requests are intended to refer to documents in your possession, care, custody, or control, whether or not this is specifically stated within the Request.

3. These Requests are intended to create a continuing obligation and require supplementation in the event any new or additional responsive documents are identified, discovered or become available at any time after these Requests are answered but before entry of a final judgment in this action.

4. If any documents or electronic data responsive to the following Requests are withheld pursuant to a claim of privilege, work-product immunity, or any other ground, respond

to the request by providing the following information: (a) identify the individual(s) with knowledge of the subject matter of the documents or electronic data, and his or her title or position; (b) describe the general subject matter of the documents or electronic data; and (c) identify, with specificity, the privilege or other basis upon which the documents or electronic data were withheld.

REQUESTS FOR PRODUCTION OF DOCUMENTS

Request for Production No. 1:

All documents, including electronically stored information (“ESI”), in your possession, custody or control concerning your acquisition of any information, including but not limited to leads or lead data, customer contact information, customer banking and customer financial information, related to the customers listed in paragraph 38 of Fora Financial’s Verified Complaint.

Request for Production No. 2:

All communications, including letters, emails, text messages, social media posts and private messages, or documents memorializing such communications, from August 1, 2022 to the present, between you, on the one hand, and the customers listed in paragraph 38 of Fora Financial’s Verified Complaint.

Request for Production No. 3:

All documents, including electronically stored information (“ESI”) and communications, including letters, emails, text messages, social media posts and private messages, or documents memorializing such communications, from August 1, 2022 to the present, between you, on the one hand, and any third party, on the other hand, concerning your disclosure of any information related to the customers listed in paragraph 38 of Fora Financial’s Verified Complaint.

Request for Production No. 4:

All communications, including letters, emails, text messages, social media posts and private messages, or documents memorializing such communications, from August 1, 2022 to the present, between you, on the one hand, and Peter Rubeiro, or any other persons acting or purporting to act on his behalf.

Dated: New York, New York
October 6, 2022

LOCKE LORD LLP

By: /s/ DRAFT
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